

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**LATOYA BROWN; et al.**

**PLAINTIFFS**

**v.**

**CIVIL ACTION NO. 3:17-cv-347 WHB LRA**

**MADISON COUNTY, MISSISSIPPI; et al.**

**DEFENDANTS**

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**MOTION TO EXCLUDE PLAINTIFFS' UNTIMELY DESIGNATION OF  
NEW EXPERT WITNESS JUSTIN MCCRARY, PH.D. [DKT. #302-4; DKT. #304-2]**

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Defendants, Madison County, Mississippi, and Sheriff Randall C. Tucker, collectively "Defendants," by and through counsel, file the following Motion to Exclude Plaintiffs' Untimely Designation of New Expert Witness Justin McCrary, Ph.D. in this matter pursuant to Fed. R. Civ. P. 26 and Fed. R. Civ. P. 37.

1. In support of this motion, Defendants adopt the reasons set forth in their separately filed Memorandum in Support of Their Motion to Exclude Plaintiffs' Untimely Designation of New Expert Witness Justin McCrary, Ph.D. [Dkt. #302-4; Dkt. #304-2].

2. Defendants rely upon the following exhibits in support of the instant motion and brief:

**Exhibit "A": McCrary Cornerstone Biography**

Pursuant to Fed. R. Civ. P. 26 and Fed. R. Civ. P. 37, and for all the reasons set forth in the Memorandum in Support of this Motion filed concurrently, Defendants move the Court to exclude Plaintiffs' untimely designation of new expert witness Justin McCrary, Ph.D.

This the 30th day of July, 2018.

**MADISON COUNTY, MISSISSIPPI and  
SHERIFF RANDALL C. TUCKER, IN  
HIS OFFICIAL CAPACITY**

BY: /s/ Charles E. Cowan

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**CERTIFICATE OF SERVICE**

I, Charles E. Cowan, hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following:

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So, certified this the 30th day of July, 2018.

/s/ Charles E. Cowan  
CHARLES E. COWAN

## CORNERSTONE RESEARCH

Economic and Financial Consulting and Expert Testimony



### Justin McCrary

Paul J. Evanson Professor of Law;  
Columbia Law School;  
Senior Advisor, Cornerstone Research

Justin McCrary is an expert in statistics and economic modeling at the intersection of law and economics, with a particular interest in antitrust.

#### Education

University of California, Berkeley, Ph.D.  
Princeton University, A.B.

Justin McCrary is an expert in statistics and economic modeling at the intersection of law and economics, with a particular interest in antitrust. He has provided expert testimony on economic theory and the proper use of econometric methods at deposition and in arbitration. Professor McCrary has extensive experience as a consulting expert on antitrust cases, including for the U.S. Department of Justice in its review of AT&T's acquisition of T-Mobile. Professor McCrary has published on the use of econometric methodology, statistics, and economic theory in a range of areas.

Prior to joining Columbia University, Professor McCrary was a member of the faculty at Berkeley Law School, University of California, where he taught courses on corporations and employment law, economic theory, crime and policing, finance, statistics, and computation. He is the founding director of the UC Berkeley Social Sciences Data Laboratory, or "D-Lab," an innovative center supporting the use of big data in social science research.

Professor McCrary's research areas include the effects of tick size regulation on high-frequency trading and market quality, econometric methodology, and the economics of corporate law. Articles that he has authored or coauthored have appeared in the *American Economic Review*, the *Journal of Econometrics*, and the *Review of Economics and Statistics*, among other journals. He is a faculty research associate at the National Bureau of Economic Research and a member of the Quantitative Advisory Board of KOR Trading.